SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C. 101 GROVERS MILL ROAD, SUITE 200 LAWRENCEVILLE, NEW JERSEY 08648

BY: Robert L. Lakind, Esquire Telephone: (609) 275-0400

Fax: (609) 275-4511

LEVY, PHILLIPS & KONIGSBERG, LLP 101 GROVERS MILL ROAD, SUITE 200 LAWRENCEVILLE, NEW JERSEY 08648

BY: Moshe Maimon, Esquire Telephone: (212) 605-6200

Fax: (212) 605-6290

Attorneys For Plaintiffs

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

BORIS GOLDENBERG, et al.,

Plaintiffs.

VS.

INDEL, INC., individually and a/k/a INDUCTOTHERM INDUSTRIES, INC. and INDUCTOTHERM CORPORATION, et al.,

Defendants.

Docket No. 1:09-cv-05202-JBS-AMD

Civil Action

NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF
(1) CLASS SETTLEMENT;
(2) REIMBURSEMENT OF EXPENSES;
(3) A CONTRIBUTION AWARD TO THE
REPRESENTATIVE PLAINTIFFS;
AND (4) ATTORNEYS' FEES

Returnable: June 17, 2013

To: Clerk, United States District Court for the District of New Jersey Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets Room 1050 Camden, NJ 08101

Craig Carpenito Alston & Bird, LLP 90 Park Avenue New York, NY 10016 Matthew S. Barndt, Esq. Vincent E. Gentile, Esq. Drinker Biddle & Reath, LLP 105 College Road East, Suite 300 Princeton, NJ 08542-0627

Theodore J. Sawicki, Esq. Alston & Bird, LLP One Atlantic Center 1201 West Peachtree Street, Suite 4200 Atlanta, GA 30309-3424 PLEASE TAKE NOTICE that on Monday, June 17, 2013 or on such date that the Court

shall determine, the undersigned attorney for Plaintiffs will apply to the United States District

Court, District of New Jersey, at the United States Court House located at 4th & Cooper Streets,

Room 1050, Camden, NJ 08101, for an Order for preliminary approval of (1) class settlement;

(2) reimbursement of expenses; (3) a contribution award to the representative plaintiffs; and (4)

attorneys' fees .

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the

accompanying Brief, Declaration of Arnold C. Lakind, and a proposed form of Order submitted

in support of this Motion.

SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C.

Attorneys for Plaintiffs

s/ A. Lakind

Arnold C. Lakind, Esq.

Dated: May 16, 2013

CERTIFICATE OF SERVICE

This is to certify that this motion, a supporting brief, the declaration of Arnold C. Lakind and a proposed form of order for preliminary approval were filed with the Clerk of the Court using the ECF system, which will automatically provide notice to the following attorneys of record by electronic means:

Theodore Sawicki
H. Doug Hinson
ALSTON & BIRD
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309

Craig Carpenito ALSTON & BIRD 90 Park Avenue New York, NY 10016

Vincent Gentile Matthew Barndt DRINKER BIDDLE & REATH, LLP 105 College Road East, Suite 300 Princeton, NJ 08542

This 16^{th} day of May 20123

SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C. Attorneys for Plaintiffs

s/ A. Lakind Arnold C. Lakind